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ALFRED VILLASENOR

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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 ALFRED VILLASENOR,

15 Defendant.

CASE NO. 2:20-CR-00050-KJM

**STIPULATION AND REQUEST
REGARDING TEMPORARY RELEASE;
FINDINGS AND ORDER**

17 Dr. Villasenor, through his counsel of record, and Assistant United States Attorney Adrian
18 Kinsella hereby stipulate that this Court grant Dr. Villasenor temporary release on May 10-12, 2021
19 from 8:00 a.m.-5:30 p.m. to attend his hearing before the California Medical Board.

20 1. Dr. Villasenor, who is a medical doctor, is facing a separate, administrative law hearing
21 before the Medical Board of California.

22 2. On February 23, 2021, Dr. Villasenor was temporarily released to meet and prepare with
23 Mr. Jonathan Turner, an administrative law attorney representing him in his administrative law case.
24 The release occurred without incident and Dr. Villasenor returned to Sacramento County Jail that day.

25 3. On April 16, 2021, Dr. Villasenor was temporarily released to attend a
26 prehearing/settlement conference before the California Medical Board.

27 4. On May 10-12, 2021, Dr. Villasenor is scheduled to have a hearing regarding his medical
28 license before the California Medical Board.

1 5. Dr. Villasenor will attend and participate in the hearing remotely with Mr. Turner at Mr.
2 Turner's office. Mr. Turner's law office is located at 1007 7th Street, Suite 304, Sacramento, CA
3 95814.

4 6. Dr. Villasenor requests that the Court find the following:

5 a) Dr. Villasenor is to be temporarily released to the custody of a defense investigator for
6 the Federal Defenders of the Eastern District of California so that he may attend and
7 participate in his hearing with Mr. Turner in Mr. Turner's law office.

8 b) Dr. Villasenor shall be released into the custody of the defense investigator, who will be
9 waiting for him outside the jail, at 8:00 a.m. on May 10-12, 2021 and shall return to the
10 Sacramento County Jail no later than 5:30 p.m. each day.

11 c) The defense investigator will escort the defendant directly to and from Mr. Turner's
12 office, with no stops along the way.

13 d) While on release, Dr. Villasenor will remain in the care, custody and control, and within
14 eyesight, of the defense investigator. The only exceptions to the "within eyesight"
15 requirement are 1) that the defense investigator may remain outside Mr. Turner's internal
16 office during Dr. Villasenor's meeting with Mr. Turner, and 2) when Dr. Villasenor is in the
17 restroom.

18 e) Dr. Villasenor will abide by all laws, and will not consume any alcohol or controlled
19 substance, prescribed or not, during the period of his temporary release.

20 f) Except from the Dr. Villasenor's criminal defense attorney, Assistant Federal Defender
21 Noa Oren, Ms. Oren's staff, Mr. Turner, Mr. Turner's staff, and any witness called by Mr.
22 Turner, the defendant shall not meet with any other people during his temporary release.

23 g) All involved parties shall abide by the Center for Disease Control and Prevention's
24 recommended COVID-19 precautions, including social distancing and the use of face masks.

25 h) The defense investigator will contact Pretrial Services and the United States Marshal
26 immediately at the phone numbers provided to him or her by defense counsel should any issue
27 arise during the release period.

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1 Date: May 4, 2021

Respectfully submitted,

2 HEATHER E. WILLIAMS
Federal Defender

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4 /s/ Noa Oren
NOA OREN
Assistant Federal Defender
Attorney for Defendant
5 ALFRED VILLASENOR
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7 PHILLIP A. TALBERT
Acting United States Attorney
8

9 /s/ Adrian Kinsella
10 ADRIAN KINSELLA
Assistant United States Attorney
Attorney for Plaintiff
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FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 10th day of May, 2021.


CHIEF UNITED STATES DISTRICT JUDGE